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FEDERAL COMMUNICATIONS COMMISSIONFEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Washington, DC 20554

In the Matter of)

Implementation of Section 17 of
the Cable Television Consumer
Protection and Competition Act
of 1992)

ET Docket No. 93-7

Compatibility Between Cable
Systems and Consumer Electronics
Equipment)**COMMENTS OF STARSIGHT TELECAST, INC.****I. OVERVIEW**

StarSight Telecast Inc., formerly InSight Telecast Inc., is the leading developer of interactive on screen television program guides. The company, substantially owned by leading cable operators, broadcasters, publishers and entertainment providers including Viacom International, Cox Communications, Spelling Entertainment, Tribune Company, Times Mirror Cable Television, Providence Journal, and KBLCOM, will be launching its service to consumers in the fourth quarter of this year. The Public Broadcasting Corporation, under its National Datacast subsidiary, has become a corporate partner in delivering StarSight's information over PBS' vertical blanking interval. The StarSight product electronics or product designs are planned to be incorporated into various models of new consumer televisions, VCRs, and cable decoders manufactured by such manufacturers as Zenith Electronics, Scientific Atlanta, General Instruments, Goldstar, Mitsubishi, and Samsung.

StarSight's television program information provides the consumer with detailed TV schedule information including program title, story plot, actors, star rating, program attributes (nudity, violence, adult themes, etc.) and handicapped program listings. The product allows the consumer to select out unwanted channels and to determine through the detailed program information what programming may be unsuitable for viewing by children. In addition, StarSight will be providing educational program schedules free into school classrooms so educators will be able to sort and select programming by theme category such as mathematics and documentaries, and subthemes, such as addition and zoology.

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The StarSight product also allows consumers or teachers to choose the title of the program selected, press one VCR record button, and have the consumer or educator's VCR record the program by show title, whenever the program actually comes on. When the StarSight product is in the consumer or educators VCR, the program will be recorded and stored by title, so playback is as easy as selecting the program title, pressing play, and the VCR automatically fast forwards or reverses and begins playing the program. This allows the VCR to be used as an instructional tool as well as facilitate the easy operation of the VCR. For example, the teacher can request a 5 minute Sesame Street math addition segment in the regular broadcast to be recorded by theme sort title "Sesame Street Math, subtheme addition, and a 5 minute segment will be automatically recorded when broadcast and played back by title when needed by the instructor and thus used as a supplemental teaching aid.

The StarSight product automatically tunes to a selected cable channel by program title so the consumer need not know the actual channel number of the desired channel. The consumer merely selects the title of the program desired, presses "tune", and the television, VCR or cable decoder changes the channel to the selected show. This cable ready TV and VCR feature eliminates consumer confusion over cable channel line-up.

The aforementioned consumer friendly, education based, parental guidance, handicapped information, and cable ready TV and VCR, and VCR recording features clearly make cable and broadcast programming as well as VCR recording more useful and manageable.

II. CABLE ACT RESPONSE COMMENTS

The Cable Television Consumer Protection and Competition Act of 1992 identified the need to resolve the interests of the consumer of television and VCR equipment with the cable operator. More importantly, the intent of the act is to provide the consumer with an easy to operate television-VCR-cable environment, and foster a competitive environment so the consumer will have economical program choices. Since StarSight will be delivering its product through both consumer electronics and cable decoder hardware platforms, and has based its products on consumer's product desires, (testing StarSight with over 2000 one-on-one interviews in 14 cities), StarSight has no other interest than adopting standards that benefit the consumer and continue to foster a competitive environment that promotes a variety of program choices which are not restricted by cable.

Over the past several years, we have participated in various joint NCTA and EIA subcommittees to develop and set standards. We have reviewed many of the comments provided by cable and consumer electronics industry companies regarding ET Docket No. 93-7, and would like to make the following specific comments:

1. Emerging consumer and education oriented technologies and services, such as StarSight, must be delivered without interference from local cable operators. These technologies are in the public interest and make cable more consumer friendly and easy to operate. They bridge the gap between consumer TVs, VCRs, and cable systems. They provide the consumer with a way of selecting out undesired programming channels as well as providing the handicapped with better viewing selections.
2. Technologies using the vertical blanking interval of broadcast stations do not remove resources from cable operators but instead provide valuable cable features.
3. In deciding what are cable ready TV and VCR features, the Commission must consider emerging features such as integrated program schedule systems that provide automated tuning functions assisting the consumer in managing cable channels and new features providing parental control as part of what can be considered consumer cable ready features.

III. CONCLUSION

We appreciate the opportunity to present these views and would look forward to providing further input as required. Since we are involved in delivering a set of consumer driven products that will work in both consumer electronic and cable hardware platforms, we are keenly interested in furthering a set of standards that aid the consumer and promote a competitive and open architecture environment meeting consumer, educator, and handicapped needs.

Respectfully submitted,

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